

MEMO ENDORSED

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January 23, 2024

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Richard Zeitlin,
23 Cr. 419 (LAK)

Dear Judge Kaplan:

This letter is respectfully submitted on behalf of Richard Zeitlin, defendant in the above-entitled matter, and whom Robert G. Bernhoft, Esq., and I represent therein, and requests a one week adjournment – until February 1, 2024 – of the due date for Mr. Zeitlin’s reply papers with respect to his renewed motion for pretrial release. I have spoken to Assistant United States Attorney Daniel H. Wolf, and he has informed me the government does not object to this application.

The reason for the requested adjournment is that this morning I tested positive for Covid-19. As a result, I cannot visit Mr. Zeitlin at the Metropolitan Detention Center (“MDC”) to review and finalize his Declaration that will accompany the reply (and I was planning to visit him today and Thursday for that purpose). Mr. Bernhoft is of course not in New York, and cannot perform that function. Also, I have been the attorney responsible for preparing the reply, and that process will likely be delayed by my current condition (given my previous experience regarding the trajectory of the infection).

*Stacy L.
1/23/24*